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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

ORIGINAL
(Red)

SUBJECT: NVF Site; Final Report Review and Closeout **DATE:** OCT 07 1988
Kennett Square, Chester County, Pennsylvania

FROM: Harry T. Daw, Environmental Engineer *[Signature]*
CERCLA Removal Enforcement Section (3HW)

TO: File

BACKGROUND

On July 25, 1988, EPA received the final report submitted by Remcor, Inc. on behalf of the NVF Company detailing the actions carried out pursuant to the January 31, 1988 Administrative Order by Consent.

The report details the work performed within the facility by location. Decontamination measures were implemented in the number seven (7) press pit and adjacent sump; electrical substations numbers six (6) and eight (8); and sampling in the storm water retention pond. Each of these areas are discussed in greater detail below.

COMPLIANCE REVIEW

Press Pit Number 7

Work was initiated in the press pit on May 9, 1988. During the first step, sludges and other debris were removed from the press pit and adjacent sump and stockpiled on site for future disposal in a permitted landfill. After this was completed the pit, in-pit machinery and sump were washed with a high pressure water and detergent mixture. Once this step was completed the concrete surfaces of the pit and sump were scabbled. Approximately one-half to three inches of concrete was removed from the pit and sump. After the scabbling was completed, the surface was rewashed and sampled to determine the effectiveness of the cleanup.

These sampling results showed that the cleanup measures were not satisfactory and that additional actions would be necessary to meet the terms of the Order. NVF decided, at this point, that they would encapsulate the pit since obtaining the required cleanup level of 10ug/100 cm² was not cost effective.

One significant point to note is that although the standard for encapsulation (100ug/ 100cm²) was met for an acceptable surface level of PCBs, it is clear from the chip samples taken from the pit that significant PCB contamination still exists

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beneath the surface of concrete. This reflects that surface cleanup concentration levels can be met as mandated by the PCB Spill Cleanup Policy while significant PCB contamination can remain beneath the surface of porous media such as concrete.

Based on these results, it appears that some other criteria is needed to measure the effectiveness of cleanups involving PCB spills on porous surfaces.

Because of the high levels of PCBs found beneath the surface of concrete, even though the surface concentrations were below those required by the PCB Spill Cleanup Policy, NVF will be required to perform annual sampling of the press pit area for five years to monitor the effectiveness of the encapsulating material, to post signs warning of the PCB contamination beneath the encapsulation, and to dispose of any excavated material from the pit as a hazardous waste.

ELECTRICAL SUBSTATIONS

Soils and gravel were removed from both of the substations. Samples were obtained from the the substation that showed that PCB levels were within allowable limits as set forth in the Spill Cleanup Policy..

STORM WATER RETENTION POND

Eight additional samples were collected in the SWRP to augment those samples taken pursuant to the June 21, 1987 Consent Order. The results found levels of 21 ppm for PCBs on average, below established limits.

CONCLUSION

NVF has met the provisions of this Consent Order and it is recommended that it be closed out.